

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

MATTHEW C. BROWNDORF,

Defendant.

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CRIMINAL NO. LKG 22-291

GOVERNMENT'S SUPPLEMENTAL FILING

The Government is providing the attached letter that it received from Liberty Mutual on December 12, 2024.

Respectfully Submitted,

Erek L. Barron
United States Attorney

By:

/s/

Christopher Sarma

Joshua Rosenthal

Assistant United States Attorneys

DECLARATION OF GENISE TEICH

I, Genise Teich, declare under penalty of perjury the following:

1. I am Senior Surety Claims Counsel for Liberty Mutual Insurance Company (“Liberty Mutual”) and provide this declaration based upon my personal knowledge and belief.

2. In reliance upon an Indemnity Agreement signed by Matthew Browndorf as managing member of BP Fisher Law Group, LLP (“BP”), Developers Surety and Indemnity Company (“Developers”) issued, as surety, certain foreclosure bonds to BP employees, as principals, engaged to foreclose loans against certain properties (the “Bonds”). Proceeds from the foreclosures were deposited into BP’s accounts and were owed to certain mortgage companies who held the loans (“Obligees”).

3. Liberty Mutual is the assignee of and administrator for Developers.

4. The nature of the foreclosure bond is such that if BP did not pay the Obligees amounts owed on the foreclosures, Liberty Mutual would make said payments if otherwise required by the Bonds. Under the Indemnity Agreement, Liberty Mutual would be entitled to recover the amount paid from the indemnitors.

5. BP did not perform its obligations and Obligees made certain claims against the Bonds. I was the claims counsel responsible for handling the claims. Liberty Mutual paid sums to Obligees under the Bonds and, while Liberty Mutual was able to recover some such money, it has not recovered its entire loss. Attached hereto as **Exhibit 1** is a true and correct payment history under the Bonds that shows Liberty Mutual has a net loss of at least \$732,828.43.

6. I understand that Matthew Browndorf controlled BP’s accounts and that Mr. Browndorf caused the funds to be transferred out of BP’s accounts, which meant BP was unable to pay the Obligees on the Bonds or to repay Liberty Mutual. It is because of that failure to pay that Liberty Mutual was required to make the payments described in

Paragraph 5 above.

I hereby declare under the penalty of perjury that the foregoing is true and correct. Executed this 12th day of December, 2024.

By: *Genise Teich*
Genise Teich

EXHIBIT 1



Account: Bp Fisher Law
Group LLP

Account Totals	
Cost Category	Totals:
Expense	\$112,418.74
LOSS	\$920,000.00
Salvage	(\$325,824.40)
Salvage Expense	\$26,234.09
Total Payments:	\$732,828.43

Claimnumber	Principal	Payee	Status	Cost Cat	Check Date	Checknumber	Amount
16L000610	William K Smart Susan Scanlon Caroline Manne	Richard Marshack, Ch. 7 Trustee	Submitted	SAL	09/29/2023	200025	(\$325,824.40)
		Select Portfolio Servicing, Inc.	Submitted	LOSS	02/03/2022	0004621791	\$730,000.00
			Submitted	LOSS	03/10/2023	0070419916	\$100,000.00
		Sokol Larkin, Portland (LMO)	Submitted	SE	09/21/2022	0070388976	\$3,916.40
			Submitted	SE	10/14/2022	0070394001	\$2,080.50
			Submitted	SE	11/15/2022	0070399913	\$3,925.87
			Submitted	SE	12/19/2022	0070406500	\$2,679.19
			Submitted	SE	01/18/2023	0070411735	\$805.00

Payment History Report - As of 09/18/2024



Account: Bp Fisher Law
Group LLP

Claimnumber	Principal	Payee	Status	Cost Cat	Check Date	Checknumber	Amount
16L000610	William K Smart Susan Scanlon Caroline Manne	Sokol Larkin, Portland (LMO)	Submitted	SE	02/16/2023	0070416433	\$3,484.16
			Submitted	SE	03/13/2023	0070420188	\$641.46
			Submitted	SE	03/20/2023	0070421390	\$2,195.41
			Submitted	SE	04/17/2023	0070425839	\$385.80
			Submitted	SE	05/10/2023	0070429844	\$1,182.50
			Submitted	SE	06/15/2023	0070435598	\$1,320.00
			Submitted	SE	08/30/2023	0070447484	\$55.00
			Submitted	SE	09/15/2023	0070450252	\$743.70
			Submitted	SE	10/12/2023	0070454408	\$56.60
	Wright, Constable & Skeen, LLP, Baltimore (LMO)		Submitted	EXP	01/04/2021	0070263036	\$10,147.50
			Submitted	EXP	01/06/2021	0070265587	\$1,292.50
			Submitted	EXP	06/14/2021	0070294838	\$16,162.50
			Submitted	EXP	06/21/2021	0070295914	\$3,536.95
			Submitted	EXP	08/03/2021	0070304437	\$4,840.00

Claimnumber	Principal	Payee	Status	Cost Cat	Check Date	Checknumber	Amount
16L000610	William K Smart Susan Scanlon Caroline Manne	Wright, Constable & Skeen, LLP, Baltimore (LMO)	Submitted	EXP	08/04/2021	0070305913	\$15,482.50
			Submitted	EXP	08/25/2021	0070308836	\$7,507.50
			Submitted	EXP	09/06/2021	0070311839	\$1,885.00
			Submitted	EXP	10/22/2021	0070321339	\$180.00
			Submitted	EXP	11/11/2021	0070325780	\$10,062.80
			Submitted	EXP	11/11/2021	0070325787	\$6,658.72
			Submitted	EXP	11/15/2021	0070326333	\$2,997.50
			Submitted	EXP	12/09/2021	0070331545	\$990.00
			Submitted	EXP	03/01/2023	0070418372	\$275.00
			Submitted	EXP	03/13/2023	0070420181	\$3,877.50
			Submitted	SE	03/14/2023	0070420357	\$2,282.50
			Submitted	SE	06/20/2023	0070436100	\$390.00
			Submitted	SE	12/21/2023	0070465657	\$90.00
Total:						\$616,305.66	

Payment History Report - As of 09/18/2024



Account: Bp Fisher Law
Group LLP

Claimnumber	Principal	Payee	Status	Cost Cat	Check Date	Checknumber	Amount	
16L000938	Bp Fisher Law Group LLP	Gordon Feinblatt, LLC	Submitted	EXP	03/19/2024	0070478130	\$10,000.00	
		Nationstar Mortgage LLC	Submitted	LOSS	04/02/2024	0070480177	\$90,000.00	
		Wright, Constable & Skeen, LLP, Baltimore (LMO)	Submitted	EXP	03/19/2024	0070478114	\$6,497.00	
			Submitted	EXP	03/25/2024	0070478988	\$9,385.77	
			Submitted	EXP	04/17/2024	0070482746	\$460.00	
			Submitted	EXP	07/22/2024	0070497149	\$180.00	
						Total:	\$116,522.77	